### **TEXT SEARCHABLE DCOUMENT 2011**

Data Evaluation Record on the Chronic Toxicity of [14C]Cypermethrin to Freshwater Invertebrates - Daphnia sp.

EPA MRID No. 47885103

Data Requirement:

EPA DP Barcode

374941

EPA MRID

47885103

EPA Guideline

850,1300

Test material:

[14C]Cypermethrin

Radiochemical Purity: 100%

Common name Cypermethrin

Chemical name: IUPAC: (RS)-α-cyano-3-phenoxybenzyl (1RS,3RS;1RS,3SR)-3-(2,2-dichlorovinyl)-2,2-

dimethylcyclopropanecarboxylate

CAS name:

(RS)- $\alpha$ -cyano-3-phenoxybenzyl (1RS,3RS;1RS,3SR)-3-(2,2-dichlorovinyl)-2,2-

dimethylcyclopropanecarboxylate

CAS No.: 52315-07-8 Synonyms: none reported

Primary Reviewer: Elizabeth A. Riley EPA, EFED, ERB6

Signature:

Elyckton Rein

Date: 4/13/11

Secondary Reviewer(s): Brian D. Keirnan EPA, EFED, ERB6

Signature: ISIL

Date: 4/13/11

**EPA PC Code** 

109702

**Date Evaluation Completed:** 

CITATION: Cafarella, M.A. 2008. Cypermethrin: Full Life Cycle Toxicity Test with Water Fleas, Daphnia Magna Under Flow-Through Conditions, Following OECD Guideline #211, and OPPTS Draft Guideline 850.1300. Unpublished study performed by Springborn Smithers Laboratories (Europe), Horn, Switzerland. Laboratory Study No. 1084.012.231. Study sponsored by FMC Corporation, Princeton, NJ. Study initiated June 22, 2007 and completed April 9, 2008.



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#### **EXECUTIVE SUMMARY:**

The 21-day-chronic toxicity of cypermethrin to *Daphnia magna* was studied under flow-through conditions. Daphnids were exposed to [ $^{14}$ C]cypermethrin at nominal concentrations of 0 (negative and solvent controls), 1.9, 3.8, 7.5, and 15 ng ai/L. Mean-measured concentrations were <LOQ (controls), 1.2, 2.4, 4.1, 8.1, and 18 ng total radioactive residues (TRR)/L, respectively. The 21-day EC<sub>50</sub> for adult immobilization was 49 (95% C.I. not calculable) ng TRR/L and the 21-day EC<sub>50</sub> (with 95% C.I.) for reproduction (offspring production) was 23 (16 to 32) ng TRR/L. The NOAEC was 4.1 ng TRR/L, based upon treatment-related reductions in reproduction and dry weight at the 8.1 and 18 ng TRR/L levels.

After 21 days, survival averaged 97.5, 95.0, 95.0, 95.0, 97.5, 100, and 60.0% for the negative control, solvent control, 1.2, 2.4, 4.1, 8.1, and 18 ng total radioactive residues (TRR)/L treatment levels, respectively. No statistically-significant differences were observed in survival, but it was notably lower in the highest treatment level relative to the others. No apparent treatment-related effect on time to first brood release was observed; it was reported that both control groups released their first brood of offspring on Day 9, compared to Days 9 to 12 for the treatment levels. No immobilized offspring were observed. The cumulative number of offspring released per female averaged 75 for the negative control, 65 for the solvent control, and 68, 67, 66, 55, and 41 for the 1.2, 2.4, 4.1, 8.1, and 18 ng TRR/L treatment levels, respectively. Differences were statistically-reduced (p<0.05) compared to the negative control at the 8.1 and 18 ng TRR/L levels. Mean total body lengths of surviving daphnia were 4.14, 3.97, 4.15, 4.07, 4.09, 4.11, and 3.83 mm for the negative control, solvent control, 1.2, 2.4, 4.1, 8.1, and 18 ng TRR/L levels, respectively. The differences was statistically-reduced (p<0.05) compared to the negative control at the 18 ng TRR/L level. Mean dry weight of surviving first-generation daphnia was 0.66, 0.53, 0.59, 0.55, 0.67, 0.49, and 0.44 mg, respectively. Dry weights were statistically-reduced (p<0.05) compared to the negative control at the 8.1 and 18 ng TRR/L levels.

#### **ADEQUACY OF THE STUDY:**

A. Classification: ACCEPTABLE

**B. Rationale:** This study is scientifically sound and satisfies the guideline requirement for a chronic toxicity study with freshwater invertebrates.

C. Repairability: NA

#### **Results Synopsis**

Test Organism Age (eg. 1<sup>st</sup> instar): First instar, <24 hours old Test Type (Flow-through, Static, Static Renewal): Flow-through

Parental Survival

EC<sub>50</sub>: 49 ng TRR/L 95% C.I.: Not calculable

Slope: 1.39 (-1.20 to 3.98) NOAEC: 18 ng TRR/L LOAEC: >18 ng TRR/L

Reproduction (offspring/parent)

EC<sub>50</sub>: 23 ng TRR/L 95% C.I.: 16 to 32 ng TRR/L

Slope: 1.56±0.369 NOAEC: 4.1 ng TRR/L LOAEC: 8.1 ng TRR/L

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Total Length

NOAEC: 8.1 ng TRR/L LOAEC: 18 ng TRR/L

Dry Weight

NOAEC: 4.1 ng TRR/L LOAEC: 8.1 ng TRR/L

Endpoints affected: offspring production, total length, and dry weight Most sensitive endpoint(s): offspring production and dry weight

#### I. MATERIALS AND METHODS

GUIDELINE FOLLOWED: OECD Guideline No. 211 (1998), and

U.S. EPA OPPTS Guideline No. 850.1300 (draft, 1996).

1. OCSPP (form. OPPTS) guidance states that among replicate test chambers of a given level, the measured concentration of the test material should not vary more than 20%. In this study, reviewer-calculated analytical variation (high:low) of total radioactive residues (TRR) of cypermethrin was 29, 12, 44, 34, and 20% for the nominal 1.9, 3.8, 7.5, 15, and 30 ng ai/L treatment levels, respectively.

The analytical LOD and LOQ were not reported.

3. The reviewer's analysis detected a slight (4%), but significant (p<0.05) reduction in body length of solvent control daphnia, compared to negative control daphnia. US EPA guidance on the use of solvents maintains that if a solvent is used, it should not interfere with the test material or organism response. Given the magnitude of the reduction and effect on only one endpoint, the reviewer does not suspect that solvent interference was a factor in this study.

These deviations do not affect the scientific soundness of this study.

**COMPLIANCE:** 

Signed and dated GLP. Quality Assurance, and Data Confidentiality claims statements were provided. This study was conducted in accordance with the Swiss Ordinance relating to Good Laboratory Practice and Compliance Monitoring (1997) with the following exceptions: routine water and food contaminant screening analyses for pesticides, PCBs, and metals.

#### A. MATERIALS:

1. Test Material

[14C]Cypermethrin

Description:

Solution in toluene

Lot No./Batch No.:

CFQ13998 - Batch 1

Radiochemical Purity:

100%

**Specific Activity:** 

55 mCi/mmol

Stability of compound

under test conditions:

In addition to LSC analyses, concentrations of parent [14C]cypermethrin were determined in the highest treatment level (i.e., nominal 30 ng ai/L) using thinlayer chromatography on Days 0, 7, 13, and 21. Results indicated that

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cypermethrin was stable throughout the study, accounting for 89 to 94% of the recovered radioactivity.

Storage conditions of test chemicals:

-20°C

Physicochemical properties of cypermethrin.

Parameter	Values	Comments
Water solubility at 20°C	Not reported	
Vapor pressure	Not reported	
UV absorption	Not reported	
pKa	Not reported	
Kow	Not reported	

(OECD recommends water solubility, stability in water and light, pKa, Pow, and vapor pressure of test compound)

#### 2. Test Organism:

Species: Daphnia magna, first instar, <24 hours old

EPA and OECD recommend <u>Daphnia magna</u>

Age of the parental

stock:

Not reported

EPA recommends that young daphnids ≤24 hours old from a separate parental culture

be used

Source:

Laboratory culture

EPA requires all test organisms must be produced from laboratory reared culture that has been maintained for at least 21 days at test conditions in dilution water with renewal

of the culture medium at least three times per week.

#### **B. STUDY DESIGN:**

#### 1. Experimental Conditions

a. Range-finding Study: A 16-day exploratory range-finding study was performed under flow-through conditions by exposing daphnid neonates (<24 hours old) to nominal concentrations of 0 (negative and solvent controls), 10, 26, 64, 160, and 400 ng ai/L. There were two replicates per level, with 10 daphnia per replicate vessel. After 16 days of exposure, survival averaged 75, 75, 90, 20, 10, 0, and 0% in the negative control, solvent control, 10, 26, 64, 160, and 400 ng ai/L levels, respectively. The number of offspring per parent averaged 44, 44, 42, 34, and 7.0 and terminal lengths averaged 3.72, 3.66, 3.77, 3.36, and 2.82 mm for the negative control, solvent control, 10, 26, and 64 ng ai/L treatment levels, respectively. Nominal concentrations selected for use in the definitive study were based upon these results and consultation with the Sponsor.

#### b. Definitive Study

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Table 1: Experimental Parameters

Dogwood	Details	Remarks	
Parameter	Details	Criteria	
Parental acclimation: Period:	Continuous	Brood daphnia were maintained in dilution water at 17.9 to 21.5°C under a 16-hour light photoperiod.	
Conditions: (same as test or not)	Same as test.		
Feeding:	Daily with 0.5 to 3.0 mL of a solution containing ca. 4 x 10 <sup>7</sup> cells/mL of the unicellular green algae, Ankistrodesmus falcatus.	The culture water (modified Elendt M4 medium) had a total hardness of 150 to 156 mg/L as CaCO <sub>3</sub> , alkalinity of 25 to 26 mg/L as CaCO <sub>3</sub> , pH of 7.60 to 7.76, and a specific conductance of 395 to 400 μS/cm.	
Health (any mortality observed):	Healthy: no signs of stress such as high mortality, presence of males, or ephippia.	EPA recommends that prior to testing, daphnids that are at least 10-12 days old (those that have had at least one brood) should be separated from the culture, put in separate container and maintained for at least 21 days to insure that good health conditions are present	
Test condition: static renewal/flow-through:	Flow-through	There were 6.43 volume replacements per day per test vessel.	
Type of dilution system- for flow through method.	Modified proportional diluter	(EPA requires consistent flow rate of 5- 10 vol/24 hours, meter systems	
Renewal rate for static renewal	N/A	calibrated before study and checked twice daily during test period)	
Aeration, if any	None reported.		
		EPA recommends test chambers should not be aerated	

D	Dataille	Remarks
Parameter	Details	Criteria
Duration of the test	21 days	
		Recommended duration is 21 days.
Test vessel  Metarials (glass/stainless steel)	Class ions with duain halos	
Material: (glass/stainless steel)  Size (for growth and reproduction/survival test):  Fill volume:	Glass jars with drain holes located ca. 15-cm from the bottom. The drain holes were covered with Nitex® 400-mesh screen.  1.6 L  1.4 L	1. Recommended Material: Glass, No. 316 stainless steel, or perfluorocarbon plastics 2. Recommended Size: 250 ml with 200 ml fill volume; 100 ml with 80 ml fill volume OECD guideline recommends that parent animals be maintained individually; one per vessel, with 50-100 ml of medium in each vessel.
Source of dilution water	Modified Elendt M4 medium prepared in a 4000-L polypropylene resin tank. The dilution water was aerated and allowed to equilibrate for 1 day prior to use.  Water quality was determined following preparation of each batch: total hardness ranged	Representative samples of the dilution water were periodically analyzed for pesticides, PCBs, and toxic metals. It was reported that none of the compounds were detected at concentrations that were considered toxic in any of the water samples analyzed in agreement with ASTM guidelines (2002).
	from 152 to 162 mg/L as CaCO <sub>3</sub> , alkalinity ranged from 26 to 37 mg/L as CaCO <sub>3</sub> , pH ranged from 7.36 to 7.70, and specific conductance ranged from 360 to 420 μS/cm.	Recommended source of dilution water includes unpolluted well or spring water that has been tested for contaminants, or appropriate reconstituted water (see ASTM for details).

D	D.4.il-	Remarks	
Parameter	Details	Criteria	
Water parameters: Hardness	144 to 158 mg/L as CaCO <sub>3</sub>	Total alkalinity ranged from 26 to 42 mg/L as CaCO <sub>3</sub> and specific conductance ranged from 390 to	
рН	6.95 to 7.56	420 μS/cm.	
Dissolved oxygen	6.61 to 9.84 mg/L (75 to 112% ASV)	Recommended hardness: 160 to 180 mg/L as CaCO <sub>3</sub> ; OECD recommends >140 mg/L as CaCO <sub>3</sub>	
Temperature	19.0 to 20.9°C	Recommended pH: 7.6 to 8.0 pH should not deviate by more than 1.0	
Total Organic Carbon Particulate matter Inorganic analytes Pesticides Chlorine Frequency of measurements	Not reported Not reported Not reported Not reported Not reported Not reported DO, temperature, and pH were measured at least weekly in each test vessel and daily in one test vessel per level. Temperature was also continuously monitored in replicate C of the 1.9 ng ai/L level. Total hardness, alkalinity, and specific conductance were measured at 0, 5, 14, and 20 Days in one replicate of the highest treatment level and the dilution water control.	unit for more than 48 hours. OECD recommends that pH range be 6 - 9 and does not vary more than 1.5 units in any one test.  Recommended dissolved oxygen: renewal should not drop below 50% for more than 48 hours.  Recommended flow-through: ≥60% throughout test.  Recommended temperature: 20°C ± 2°C.; should not deviate from 20°C by more than 5°C for more than 48 hours. OECD recommends a range of 18 - 22°C; temperature should not vary more than ± 2°C OECD guideline recommends that total organic carbon <2 mg/L	
Number of replicates: For growth and reproduction:	4 replicates per level	There were five toxicant levels spaced by a separation factor of 2.	
For survival test:	Same	Number of replicates should include a control(s) and at least 5 test concentrations; dilution factor should not be greater than 50%.  OECD recommends that at least 5 test concentrations be used in a geometric series with a separation factor not exceeding 3.2.	

	D 4.7	Remarks	
Parameter	Details	Criteria	
Number of organisms: For growth and reproduction:	10 organisms per replicate	Loading did not cause the DO to fall to <60% ASV.	
For survival test:	Same	Recommended number of organisms include 22 daphnids/test concentration; 7 test chambers should contain 1 daphnid each, and 3 test chambers contain 5 daphnids each. OECD recommends holding a minimum of 10 daphnids individually for static tests. For flow-through tests, 40 animals should be divided into 4 groups of 10 animals at each test concentration.	
Treatment Concentrations: nominal:	0 (negative and solvent controls), 1.9, 3.8, 7.5, 15, and 30 ng ai/L	Water samples were collected from two replicates per level (alternating) at 0, 7, 13, and 21 Days. Due to low recoveries at the 7.5-ng ai/L level on Day 13, an	
mean-measured:	<loq (controls),="" 1.2,="" 18="" 2.4,="" 4.1,="" 8.1,="" and="" l<="" ng="" td="" trr=""><td>additional sample was collected on Day 14. Samples were analyzed for total radioactive residues of cypermethrin using LSC. In addition, aliquots from the highest treatment level were analyzed for parent cypermethrin using TLC (see Reviewer's Comments section).</td></loq>	additional sample was collected on Day 14. Samples were analyzed for total radioactive residues of cypermethrin using LSC. In addition, aliquots from the highest treatment level were analyzed for parent cypermethrin using TLC (see Reviewer's Comments section).	
		A high level of analytical variation was indicated for all except the 3.8 ng ai/L level. Based upon LSC results, analytical variation (reviewer-calculated) was 29, 12, 44, 34, and 20% for the nominal 1.9, 3.8, 7.5, 15, and 30 ng ai/L levels, respectively.	
		Mean-measured concentrations ranged from 54 to 65% of nominal concentrations.	

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	D.4.1	Remarks	
Parameter	Details	Criteria	
Solvent (type, percentage, if used)	Acetone, 50 μL/L.		
		Solvent concentration should not exceed 0.5 ml/L for static tests or 0.1 ml/L for flow-through tests. Recommended solvents include dimethylformamide, triethylene glycol, methanol, acetone and ethanol. OECD recommends #0.1 ml/L of solvent.	
Lighting	16-hours light, 8-hours dark; light intensity at the test solutions' surface ranged from 235 to 410 Lux.	Recommended photoperiod is 16 hours light and 8 hours of dark.	
Recovery of chemical:	70 to 96% of nominal (excluding one outlier of 65%)	Based on QC samples analyzed concurrently with the test samples (total of 21 samples).	
Frequency of measurement:	Days 0, 7, 13/14, and 21	(total of 21 samples).	
LOD: LOQ:	Not reported Not reported		
Positive control {if used, indicate the chemical and concentrations}	None tested		
Other parameters, if any Feeding:	During the test, daphnia were fed three times daily with 3.0 mL of algal suspension (Ankistrodesmus falcatus, 4 x 10 <sup>7</sup> cells/mL).		

#### 2. Observations:

Table 2: Observations

Parameters	Details	Remarks		
	Details	Criteria		
Data endpoints measured (list)	<ul> <li>Parental immobility (mortality)</li> <li>Other parental sub-lethal effects</li> <li>Time to first brood release</li> <li>Offspring production</li> <li>Offspring immobility</li> <li>Terminal length and dry weight of surviving P-generation</li> </ul>	Recommended endpoints measured: - Survival of first-generation daphnids, - Number of young produced per female, - Dry weight (required) and length (optional) of each first generation daphnid alive at the end of the test, - Observations of other effects or clinical signs.		
Observation intervals	All test vessels were examined daily. Assessments of offspring released were determined beginning on Day 10 and three times per week thereafter. Growth measurements were determined on Day 21.			
Were raw data included?	Yes			
Other observations, if any	The physical characteristics of the test solutions were recorded daily.			

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#### II. RESULTS AND DISCUSSION

#### A. MORTALITY:

No statistically-significant differences were observed in survival, although survival at the highest treatment level was notably lower than all other levels and controls. After 21 days, survival averaged 97.5, 95.0, 95.0, 95.0, 97.5, 100, and 60.0% for the (mean-measured) negative control, solvent control, 1.2, 2.4, 4.1, 8.1, and 18 ng total radioactive residues (TRR)/L treatment levels, respectively. The 21-day EC<sub>50</sub> (with 95% C.I.) was reported by the study author to be 43 (9.0 to not calculable) ng TRR/L, and the NOAEC was reported to be 18 ng TRR/L.

Table 3: Effect of Cypermethrin on Survival, Reproduction, and Growth of Daphnia sp.

Treatment Mean-measured (and nominal) conc.	Cumulative Mortality (dead or immobile)		Mean Day of First Brood	Mean No. Young Per	Mean Total Body Length,	Mean Dry Weight,
ng TRR/L <sup>(a)</sup>	No.	%	Brood	Adult	mm ± SD	mg ± SD
Control (dilution water only)	1	2.5	Not reported	75	$4.14 \pm 0.16$	$0.66 \pm 0.20$
Solvent control	2	5.0	Not reported	65	$3.97 \pm 0.17$	$0.53 \pm 0.16$
1.2 (1.9)	2	5.0	Not reported	68	$4.15 \pm 0.14$	$0.59 \pm 0.20$
2.4 (3.8)	2	5.0	Not reported	76	$4.07 \pm 0.15$	$0.55 \pm 0.15$
4.1 (7.5)	1	2.5	Not reported	66	$4.09 \pm 0.16$	$0.67 \pm 0.14$
8.1 (15)	0	0	Not reported	55*	4.11 ± 0.17	0.49 ± 0.16*
18 (30)	16	40	Not reported	41*	3.83 ± 0.20*	0.44 ± 0.14*
NOAEC, ng TRR/L	18		4.1		8.1	4.1
LOAEC, ng TRR/L	>18	_	8.1		18	8.1
LC/EC <sub>50</sub> (with 95% C.I.), mg ai/L	43 (9.0-	not calc.) <sup>(b)</sup>	Not reported	26 (14 to 138)	Not reported	Not reported

<sup>(</sup>a) For comparison purposes, reviewer-calculated time-weighted average (TWA) concentrations were 1.2, 2.4, 4.2, and 8.4 ng TRR/L, respectively.

<sup>(</sup>b) The EC<sub>50</sub> was extrapolated; thus, robust confidence intervals could not be calculated.

<sup>\*</sup>Statistically-reduced compared to the negative control (p<0.05).

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#### **B. EFFECTS ON REPRODUCTION AND GROWTH:**

It was reported that both control groups released their first brood of offspring on Day 9 (although a quantitative assessment was not made until Day 10). First brood release for all treatment levels ranged from Days 9 to 12, which was reported as consistent with the negative and solvent control performance. Actual days to first brood release were not calculated, and could not be determined by the reviewer as offspring were not counted daily during the reproductive period.

The cumulative number of offspring released per female averaged 75 for the negative control, 65 for the solvent control, and 68, 67, 66, 55, and 41 for the mean-measured 1.2, 2.4, 4.1, 8.1, and 18 ng TRR/L treatment levels, respectively. Differences were statistically-reduced (p<0.05) compared to the negative control at the 8.1 and 18 ng TRR/L levels. The EC<sub>50</sub> (with 95% C.I.) was reported to be 26 (14 to 138) ng TRR/L, and the NOAEC was reportedly 4.1 ng TRR/L.

There were no immobilized offspring produced.

At study termination, mean total body lengths of surviving daphnia were 4.14, 3.97, 4.15, 4.07, 4.09, 4.11, and 3.83 mm for the negative control, solvent control, 1.2, 2.4, 4.1, 8.1, and 18 ng TRR/L levels, respectively. The differences was statistically-reduced (p<0.05) compared to the negative control at the 18 ng TRR/L level. Mean dry weight of surviving first-generation daphnia was 0.66, 0.53, 0.59, 0.55, 0.67, 0.49, and 0.44 mg, respectively. Dry weights were statistically-reduced (p<0.05) compared to the negative control at the 8.1 and 18 ng TRR/L levels. Based on terminal dry weight, the NOAEC for growth was reported to be 4.1 ng TRR/L.

#### C. REPORTED STATISTICS:

Data that were statistically analyzed included organism survival (i.e., immobilization), reproduction (cumulative number of offspring produced per female), and growth (as total body length and dry body weight). The time to first brood release data were not statistically assessed.

A t-Test was used to compare the performance of the dilution water control with that of the solvent control. A statistically-significant difference was observed between the two control groups for terminal length. Since further statistical analyses indicated that this endpoint was not the most sensitive, this difference in control performance had no notable effect on the outcome of the study. All treatment levels were compared to the performance of the negative control.

For all endpoints, data were assessed for normality using the Shapiro-Wilks' Test and for homogeneity of variance using Bartlett's test. Survival data failed both assumptions, and were arc-sine transformed prior to analysis using the non-parametric Steel's Many-One Rank Test. Length data were not normally distributed and were therefore also analyzed using Steel's Many-One Rank Test. Reproductive and dry weight data met both assumptions and were evaluated with Williams' Test to establish treatment-related effects.

The NOAEC and LOAEC were based on significance data. All analyses were performed using TOXSTAT® version 3.5 and mean-measured concentrations of total radioactive residues (TRR) of cypermethrin.

The 21-day EC<sub>50</sub> values (with 95% C.I.) were determined using the bionomial method.

Parental Survival

EC<sub>50</sub>: 43 ng TRR/L 95% C.I.: 9.0 to not calculable

NOAEC: 18 ng TRR/L LOAEC: >18 ng TRR/L

95% C.I.: 14 to 138 ng TRR/L

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Reproduction (offspring/parent)

EC<sub>50</sub>: 26 ng TRR/L

NOAEC: 4.1 ng TRR/L

LOAEC: 8.1 ng TRR/L

Total Length

NOAEC: 8.1 ng TRR/L LOAEC: 18 ng TRR/L

Dry Weight

NOAEC: 4.1 ng TRR/L LOAEC: 8.1 ng TRR/L

#### D. VERIFICATION OF STATISTICAL RESULTS:

Statistical Method(s): The reviewer verified results for survival, reproduction, length, and dry weight. The negative and solvent control data were compared for all endpoints using a Student's t-test. A significant difference (p<0.05) was detected for the length endpoint only and the magnitude of the effect was small (4%), so the reviewer did not consider this to be a case of solvent interference. Data were further tested to determine if they satisfied the assumptions of normality using Shapiro-Wilk's test and homogeneity of variances using Levene's test. The data for survival and length failed to meet these assumptions, so the NOAEC and LOAEC for these endpoints were determined using the non-parametric Steele's many-one rank test. Data for reproduction and dry weight satisfied these assumptions, so the NOAEC and LOAEC were determined using ANOVA, followed by Dunnett's or William's (dose-dependent response) multiple comparison test. These analyses were conducted using the Toxstat 3.5 statistical program. The reviewer additionally used the Probit method to estimate the 21-day LC<sub>50</sub> using Toxanal 2009 and the 21-day EC<sub>50</sub> for reproduction using Nuthatch statistical software. Both values exceeded the highest levels tested and the LC<sub>50</sub> was not associated with a calculable 95% confidence interval, so these results should be interpreted with caution.

Parental Survival

EC<sub>50</sub>: 49 ng TRR/L 95% C.I.: Not calculable

Slope: 1.39 (-1.20 to 3.98) NOAEC: 18 ng TRR/L LOAEC: >18 ng TRR/L

Reproduction (offspring/parent)

EC<sub>50</sub>: 23 ng TRR/L 95% C.I.: 16 to 32 ng TRR/L

Slope: 1.56±0.369 NOAEC: 4.1 ng TRR/L LOAEC: 8.1 ng TRR/L

Total Length

NOAEC: 8.1 ng TRR/L LOAEC: 18 ng TRR/L

Dry Weight

NOAEC: 4.1 ng TRR/L LOAEC: 8.1 ng TRR/L

Endpoints affected: offspring production, total length, and dry weight Most sensitive endpoint(s): offspring production and dry weight Page 14 of 28

#### **E. STUDY DEFICIENCIES:**

Based upon results obtained from LSC analyses (total radioactivity), a high level of analytical variation was observed at all except the nominal 3.8 ng ai/L level. Reviewer-calculated percent variation was 29, 44, 34, and 20% for the nominal 1.9, 7.5, 15, and 30 ng ai/L levels, respectively. The study author reported that given the nature of the test material (which is known to be highly sorptive) and given the dynamics of the test system (e.g., presence of algae and increasing biomass), that it was not unexpected to see variable recoveries, especially at the low levels tested. Despite high analytical variation there was no overlap between treatment levels. In addition to the high analytical variation observed during the study, the analytical LOD and/or LOQ were not reported.

#### F. REVIEWER'S COMMENTS:

The reviewer's results agreed with the results obtained by the study author. Neither the reviewer nor the study author detected a significant reduction in survival at the highest level (because one replicate from this level overlapped with the control response and zero variance in one group required use of a non-parametric test to determine the NOAEC), but it should be noted that this endpoint was reduced an average of 40%, relative to the control.

In general, validity requirements were fulfilled. Specifically, negative and solvent control immobility was 2.5 and 5.0%, respectively (no more than 20% permissible); and each negative and solvent control daphnid living the full 21 days produced an average of 75 and 65 young, respectively (minimum of 60 required). It was not reported if any ephippia were produced by control animals.

For comparison purposes, TWA concentrations were calculated by the reviewer (refer to associated Excel worksheet in Appendix II). As TWA concentrations were comparable to mean-measured concentrations provided by the reviewer, they were not otherwise reported in the DER. TWA concentrations were calculated using the following equation:

$$C_{TWA} = \frac{\left(\frac{C_1 + C_0}{2}\right)(t_1 - t_0) + \left(\frac{C_2 + C_1}{2}\right)(t_2 - t_1) + \left(\frac{C_{n-1} + C_2}{2}\right)(t_{n-1} - t_2) + \left(\frac{C_n + C_{n-1}}{2}\right)(t_n - t_{n-1})}{t_n}$$

where:

C TWA is the time-weighted average concentration,

C j is the concentration measured at time interval j (j = 0, 1, 2,...n)

t j is the number of hours (or days or weeks, units used just need to be consistent in the equation) of the test at time interval j (e.g., t 0 = 0 hours (test initiation), t 1 = 24 hours, t 2 = 96 hours).

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A [\$^4\$C]cypermethrin super stock solution was prepared 16 days prior to study initiation and during the study using the following purification method: 12 g of Cilicagel and 20 mL trichloroethylene (TCE) were added to a small beaker and sonicated for 5 minutes. The gel was transferred to a 30-cm column and rinsed with additional TCE. A 65-μL of [\$^{14}\$C]cypermethrin was applied to the top of the gel column, and the column was rinsed 70 times with 6-mL fractions of TCE. Fractions were collected in 20-mL LSC vials, and LSC counts were performed on every other vial through vial no. 59. The test material eluted between fractions 21 and 57. Radiochemical purity was determined using TLC analysis from fractions 24 to 45. All fractions from 21 through 57 were pooled and evaporated to *ca.* 5 mL, then taken to dryness with nitrogen. The test material was re-dissolved in 5 mL acetone and final LSC and TLC measurements were taken. Test stock solutions were prepared prior to and during the test by diluting the appropriate amount of super stock to 50 mL with acetone. The concentrations of the stock solutions were verified using LSC prior to use.

During the study, 1000-mL water samples were extracted twice with 200 mL hexane. The organic phase was concentrated to near dryness using rotary evaporation (at 30°C and 250 mbar), then to dryness under nitrogen. The residues were dissolved in 1 mL acetonitrile, and aliquots were analyzed for total radioactive residues (TRR) of cypermethrin using LSC. Samples from the highest treatment level (i.e., 30 ng ai/L) were also analyzed for parent [\frac{14}{C}]cypermethrin using TLC (not further described). Analytical LOD and LOQ were not reported.

The experimental phase of the definitive study was conducted from January 25 to February 15, 2008.

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#### G. CONCLUSIONS:

This study is scientifically sound and is thus acceptable. Based upon treatment-related reductions in reproduction (offspring per female) and dry weights of surviving first-generation daphnia (the most sensitive endpoints), the NOAEC and LOAEC were 4.1 and 8.1 ng TRR/L, respectively. The 21-day EC<sub>50</sub> (with 95% C.I.) for offspring production was 23 (16 to 32) ng TRR/L. The total lengths of daphnia were also reduced at the 18 ng TRR/L treatment level. No statistically-significant effects on survival of first-generation daphnia were observed. The 21-day EC<sub>50</sub> (with 95% C.I.) for immobility was 49 (95% C.I. not calculable) ng TRR/L.

#### Parental Survival

EC<sub>50</sub>: 49 ng TRR/L

95% C.I.: Not calculable

Slope: 1.39 (-1.20 to 3.98) NOAEC: 18 ng TRR/L LOAEC: >18 ng TRR/L

#### Reproduction (offspring/parent)

EC<sub>50</sub>: 23 ng TRR/L

95% C.I.: 16 to 32 ng TRR/L

Slope: 1.56±0.369 NOAEC: 4.1 ng TRR/L LOAEC: 8.1 ng TRR/L

#### **Total Length**

NOAEC: 8.1 ng TRR/L LOAEC: 18 ng TRR/L

#### Dry Weight

NOAEC: 4.1 ng TRR/L LOAEC: 8.1 ng TRR/L

Endpoints affected: offspring production, total length, and dry weight Most sensitive endpoint(s): offspring production and dry weight

#### III. REFERENCES:

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#### APPENDIX I. OUTPUT OF REVIEWER'S STATISTICAL VERIFICATION:

Title: Adult survival

File: 5103s

Transform:

NO TRANSFORMATION

t-Test of Solvent and Blank Controls

Ho: GRP1 Mean = GRP2 Mean

\_\_\_\_\_\_

GRP1 (Solvent cntl) Mean = 95.0000 Calculated t value = 0.0000 GRP2 (Blank cntl) Mean = 95.0000 Degrees of freedom = 6

Difference in means = 0.0000

2-sided t value (0.05, 6) = 2.4469 No significant difference at alpha=0.05

2-sided t value (0.01, 6) = 3.7074 No significant difference at alpha=0.01

WARNING: This procedure assumes normality and equal variances!

Title: Adult survival

File:

Transform:

NO TRANSFORMATION

	Steel's Many-One	Rank Test	- Ho:	Control	Treatmen	ıt 
GROUP	IDENTIFICATION	MEAN IN ORIGINAL UNITS	RANK SUM	CRIT. VALUE	DF 0	SIG .05
1 2 3 4 5	Neg Control 1.2 2.4 4.1 8.1	95.0000 95.0000 97.5000 97.5000 100.0000 60.0000	18.00 20.00 20.00 22.00 11.00	10.00 10.00 10.00 10.00	4.00 4.00 4.00 4.00	

Critical values are 1 tailed ( k = 5 )

Title: Cumulative progeny/female

File: 5103r

Transform: NO TRANSFORMATION

t-Test of Solvent and Blank Controls Ho: GRP1 Mean = GRP2 Mean 

GRP1 (Solvent cntl) Mean = 74.5000 Calculated t value = 0.9283 GRP2 (Blank cntl) Mean = 65.5000 Degrees of freedom = 6

Difference in means = 9.0000

\_\_\_==

2-sided t value (0.05, 6) = 2.4469 No significant difference at alpha=0.05

2-sided t value (0.01, 6) = 3.7074 No significant difference at alpha=0.01

WARNING: This procedure assumes normality and equal variances!

Title: Cumulative progeny/female

File: 5103r Transform: NO TRANSFORMATION

Shapiro - Wilk's Test for Normality

EPA MRID No. 47885103

D = 860.7500W = 0.9795

Critical W = 0.8840 (alpha = 0.01 , N = 24) W = 0.9160 (alpha = 0.05 , N = 24)

\_\_\_\_\_

Data PASS normality test (alpha = 0.01). Continue analysis.

Title: Cumulative progeny/female

File: 5103r Transform: NO TRANSFORMATION

Levene's Test for Homogeneity of Variance

#### ANOVA Table

SOURCE	DF	SS	MS	F
Between	5	53.2083	10.6417	0.5139
Within (Error)	18	372.7500	20.7083	
Total	23	425.9583		

(p-value = 0.7623)

Critical F = 4.2479 (alpha = 0.01, df = 5.18) = 2.7729 (alpha = 0.05, df = 5.18)

Since F < Critical F FAIL TO REJECT Ho: All equal (alpha = 0.01)

Title: Cumulative progeny/female

File: 5103r Transform: NO TRANSFORMATION

ANOVA Table

SOURCE	DF	SS	MS	F
Between	5	2928.2083	585.6417	12.2469
Within (Error)	18	860.7500	47.8194	
Total	23	3788.9583		

(p-value = 0.0000)

Critical F = 4.2479 (alpha = 0.01, df = 5.18) = 2.7729 (alpha = 0.05, df = 5.18)

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Since F > Critical F REJECT Ho: All equal (alpha = 0.05)

Title: Cumulative progeny/female

File: 5103r Transform: NO TRANSFORMATION

	Dunnett's Test -	TABLE 1 OF 2	Ho:Control <t< th=""><th>reatment</th><th></th></t<>	reatment	
GROUP	IDENTIFICATION	TRANSFORMED MEAN	MEAN CALCULATED IN ORIGINAL UNITS	T STAT	SIG
1	Neg Control	74.5000	74.5000		
2	1.2	68.0000	68.0000	1.3293	
3	2.4	66.5000	66.5000	1.6361	
4	4.1	65.5000	65.5000	1.8406	
5	8.1	55.2500	55.2500	3.9368	*
6	18	40.5000	40.5000	6.9533	*

Dunnett critical value = 2.4100 (1 Tailed, alpha = 0.05, df = 5,18)

Title: Cumulative progeny/female

Transform: NO TRANSFORMATION 5103r

	Dunnett's Test -	TABLE 2	OF 2	Ho:Control<	Treatment
GROUP	IDENTIFICATION	NUM OF REPS	MIN SIG DIFF (IN ORIG. UNITS	% OF S) CONTROL	DIFFERENCE FROM CONTROL
1	Neg Control	4			~
2	1.2	4	11.7843	15.8	6.5000
3	2.4	4	11.7843	15.8	8.0000
4	4.1	4	11.7843	15.8	9.0000
5	8.1	4	11.7843	15.8	19.2500
6	18	4	11.7843	15.8	34.0000

Title: Cumulative progeny/female File: 5103r Transform: NO TRANSFORMATION

William's Test - TABLE 1 OF 2 Ho: Control<Treatment

			ORIGINAL	TRANSFORMED	ISOTONIZED
GROUP	IDENTIFICATION	N	MEAN	MEAN	MEAN
1	Neg Control	4	74.5000	74.5000	74.5000
2	1.2	4	68.0000	68.0000	68.0000
3	2.4	4	66.5000	66.5000	66.5000

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		4	65 5000		55 5000	
		4		)	55.2500	65.5000 55.2500 40.5000
		male		cm :	NO	TRANSFORMATIO
Villiam's Test	- TAB:	LE 2	OF 2	Но: (	Control <trea< td=""><td>itment</td></trea<>	itment
IFICATION	MEANS		CALC. WILLIAMS	SIG 0.05	TABLE WILLIAMS	DEGREES OF FREEDOM USE
1.2 2.4 4.1 8.1	68.00 66.50 65.50 55.25	00 00 00 00	1.8406 3.9368	* *	1.8600	k= 2, V=1 k= 3, V=1 k= 4, V=1
31 Transform:				DD2 Maan		
cntl) Mean = 4.14 ntl) Mean = 3.96	50 Calc	ulated	======================================	<del></del> 715		
Cotal length		ality a	•		ио	TRANSFORMATION
_		ilk':	s Test for	Normali	ity	
0.2073		~ <b>-</b>				
		_	= 0.01 , N			
	### STO3:  ### William's Test  ### IFICATION    Neg Control	### STO3T  #### COMPARE  IFICATION MEANS  Neg Control 74.50	COMPARED IFICATION MEANS  Neg Control 74.5000 1.2 68.0000 2.4 66.5000 4.1 65.5000 8.1 55.2500 18 40.5000  9152  ength Olvent and Blank Controls Ho: Grant Control Mean = 3.9675 Degrees of the control of	COMPARED CALC.  IFICATION MEANS WILLIAMS  Neg Control 74.5000  1.2 68.0000 1.3293  2.4 66.5000 1.6361  4.1 65.5000 1.8406  8.1 55.2500 3.9368  18 40.5000 6.9533  9152  ength Solvent and Blank Controls Ho: GRP1 Mean = Gleant Means = 0.1775  control Mean = 4.1450 Calculated t value = 2.60 (0.05, 6) = 2.4469** Significant difference at alpha (0.01, 6) = 3.7074 No significa	Signature   Transform:   William's Test   Table 2 OF 2	## STOST   Transform: NO   William's Test - TABLE 2 OF 2   Ho: Control <treat< td=""></treat<>

Data FAIL normality test (alpha = 0.01). Try another transformation.

EPA MRID No. 47885103

Warning - The first three homogeneity tests are sensitive to non-normality and should not be performed with this data as is.

Title: Total length

File: 51031 Transform: NO TRANSFORMATION

Levene's Test for Homogeneity of Variance

#### ANOVA Table

SOURCE	DF	SS	MS	F
Between	5	0.0453	0.0091	2.2565
Within (Error)	18	0.0722	0.0040	
Total	23	0.1175		

(p-value = 0.0928)

Critical F = 4.2479 (alpha = 0.01, df = 5.18) = 2.7729 (alpha = 0.05, df = 5.18)

Since F < Critical F FAIL TO REJECT Ho: All equal (alpha = 0.01)

Title: Total length

File: 51031 Transform: NO TRANSFORMATION

	Steel's Many-One	Rank Test	- Ho:	Control	Treatmer	ıt
GROUP	IDENTIFICATION	MEAN IN ORIGINAL UNITS	RANK SUM	CRIT. VALUE	DF (	SIG 0.05
1	Neg Control	4.1450				
2	1.2	4.1475	17.50	10.00	4.00	
3	2.4	4.0700	13.00	10.00	4.00	
4	4.1	4.0925	14.50	10.00	4.00	
5	8.1	4.1100	16.00	10.00	4.00	
6	18	3.7525	10.00	10.00	4.00	*

Critical values are 1 tailed (k = 5)

Title: Dry weight

File: 5103w Transform: NO TRANSFORMATION

t-Test of Solvent and Blank Controls Ho: GRP1 Mean = GRP2 Mean

TIEST OF SOFT WIRE DIMINE CONTROLS THE OFFI THEM OFFI THEM OFFI THEM OFFI THE OFFI T

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GRP1 (Solvent cntl) Mean = 0.6625 Calculated t value = 1.7241
GRP2 (Blank cntl) Mean = 0.5300 Degrees of freedom = 6
Difference in means = 0.1325
2-sided t value (0.05, 6) = 2.4469 No significant difference at alpha=0.05
2-sided t value (0.01, 6) = 3.7074 No significant difference at alpha=0.01
 WARNING: This procedure assumes normality and equal variances!
 Title: Dry weight
                          Transform:
 File:
                 5103w
                                                     NO TRANSFORMATION
                Shapiro - Wilk's Test for Normality
     D = 0.1096
     W = 0.9593
     Critical W = 0.8840 (alpha = 0.01 , N = 24)
             W = 0.9160 \text{ (alpha = 0.05 , } N = 24)
 Data PASS normality test (alpha = 0.01). Continue analysis.
 Title: Dry weight
 File:
                 5103w
                                 Transform:
                                             NO TRANSFORMATION
                 Levene's Test for Homogeneity of Variance
                           ANOVA Table
 ______
    SOURCE
             DF
                                 SS
 5
   Between
                                  0.0092 0.0018 0.7081
   Within (Error) 18 0.0466
                                           0.0026
             23
                                  0.0558
                                                    (p-value = 0.6250)
    Critical F = 4.2479 (alpha = 0.01, df = 5.18)
= 2.7729 (alpha = 0.05, df = 5.18)
    Since F < Critical F FAIL TO REJECT Ho: All equal (alpha = 0.01)
 Title: Dry weight
                 5103w
 File:
                                 Transform:
                                                     NO TRANSFORMATION
                           ANOVA Table
```

Data Evaluation Record on the Chronic Toxicity of [14C]Cypermethrin to Freshwater Invertebrates - Daphnia sp.

EDA	MRID No.	47005102	
EPA	IVIKID NO.	4/883103	

SOURCE	DF	SS	MS	F
Between	5	0.1905	0.0381	6.2571
Within (Error)	18	0.1096	0.0061	
Total	23	0.3002		
			٠	0 0016

(p-value = 0.0016)

Critical F = 4.2479 (alpha = 0.01, df = 5.18) = 2.7729 (alpha = 0.05, df = 5.18)

Since F > Critical F REJECT Ho: All equal (alpha = 0.05)

Title: Dry weight

File: 5103w Transform: NO TRANSFORMATION

	Dunnett's Test -	TABLE 1 OF 2	Ho:Control<	Treatment	:
GROUP	IDENTIFICATION	TRANSFORMED MEAN	MEAN CALCULATED IN ORIGINAL UNITS	T STAT	SIG
	Now Control	0.6625	0.6625		
1	Neg Control	0.6625	0.6625		
2	1.2	0.5925	0.5925	1.2685	
3	2.4	0.5500	0.5500	2.0387	
4	4.1	0.6675	0.6675	-0.0906	
5	8.1	0.4900	0.4900	3.1260	*
6	18	0.4200	0.4200	4.3945	*

Dunnett critical value = 2.4100 (1 Tailed, alpha = 0.05, df = 5,18)

Title: Dry weight

File: 5103w Transform: NO TRANSFORMATION

	Dunnett's Test -	TABLE 2 C	F 2 Ho	:Control<	Treatment
GROUP	IDENTIFICATION	NUM OF REPS	MIN SIG DIFF (IN ORIG. UNITS)	% OF CONTROL	DIFFERENCE FROM CONTROL
1	Neg Control	4			
2	1.2	4	0.1330	20.1	0.0700
3	2.4	4	0.1330	20.1	0.1125
4	4.1	4	0.1330	20.1	-0.0050
5	8.1	4	0.1330	20.1	0.1725
6	18	4	0.1330	20.1	0.2425

EPA MRID No. 47885103

Title: Dry weight

File: 5103w Transform: NO TRANSFORMATION

William's Test - TABLE 1 OF 2 Ho: Control<Treatment

			ORIGINAL	TRANSFORMED	ISOTONIZED
GROUP	IDENTIFICATION	N	MEAN	MEAN	MEAN
1	Neg Control	4	0.6625	0.6625	0.6625
2	1.2	4	0.5925	0.5925	0.6033
3	2.4	4	0.5500	0.5500	0.6033
4	4.1	4	0.6675	0.6675	0.6033
5	8.1	4	0.4900	0.4900	0.4900
6	18	4	0.4200	0.4200	0.4200

Title: Dry weight

File: 5103w Transform: NO TRANSFORMATION

William's Test - TABLE 2 OF 2 Ho: Control<Treatment

IDENTIFICATION	COMPARED	CALC.	SIG	TABLE	DEGREES OF
	MEANS	WILLIAMS	0.05	WILLIAMS	FREEDOM USED
Neg Control 1.2 2.4 4.1 8.1 18	0.6625 0.6033 0.6033 0.6033 0.4900 0.4200	1.0722 1.0722 1.0722 3.1260 4.3945	*	1.7300 1.8200 1.8500 1.8600 1.8700	k= 1, v=18 k= 2, v=18 k= 3, v=18 k= 4, v=18 k= 5, v=18

s = 0.0780

WARNING: Procedure has used isotonized means which differ from original (transformed) means.

*****	*****	*****	******	******
CONC.	NUMBER	NUMBER	PERCENT	BINOMIAL
	EXPOSED	DEAD	DEAD	PROB. (PERCENT)
18	40	16	40	0
8.1	40	0	0	0
4.1	40	1	2.5	0
2.4	40	2	5	0
1.2	4.0	2	5	n

BECAUSE THE NUMBER OF ORGANISMS USED WAS SO LARGE, THE 95 PERCENT CONFIDENCE INTERVALS CALCULATED FROM THE BINOMIAL PROBABILITY ARE UNRELIABLE. USE THE INTERVALS CALCULATED BY THE OTHER TESTS.

AN APPROXIMATE LC50 FOR THIS SET OF DATA IS 0

EPA MRID No. 47885103

THE MOVING AVERAGE METHOD CANNOT BE USED WITH THIS DATA SET BECAUSE NO SPAN WHICH PRODUCES MOVING AVERAGE ANGLES THAT BRACKET 45 DEGREES ALSO USES TWO PERCENT DEAD BETWEEN 0 AND 100 PERCENT.

RESULTS CALCULATED USING THE PROBIT METHOD

ITERATIONS G H GOODNESS OF FIT PROBABILITY

6 3.473185 5.193116 1.383066E-03

SINCE THE PROBABILITY IS LESS THAN 0.05, RESULTS CALCULATED USING THE PROBIT METHOD PROBABLY SHOULD NOT BE USED.

1.388143

95 PERCENT CONFIDENCE LIMITS =-1.198867 AND 3.975152

INTERCEPT=-2.345617

LC50 = 48.94998

95 PERCENT CONFIDENCE LIMITS = 9.643511 AND +INFINITY

LC25 = 15.99011

95 PERCENT CONFIDENCE LIMITS = 0 AND +INFINITY

LC10 =5.841232

95 PERCENT CONFIDENCE LIMITS = 0 AND +INFINITY

T<sub>1</sub>C05 = 3.197333

95 PERCENT CONFIDENCE LIMITS = 0 AND +INFINITY

### APPENDIX II: COPY OF REVIEWER'S TWA CALCULATIONS (USING EXCEL):

Time-Weighted Concentrations

Nominal		Measured Concentration (ng	TWA (ng
Concentration (ng ai/L)	Time (Day)	TRR/L)	TRR/L)
1.9	0	1.2	
	7	1.4	
	13	1	
	21	1.3	
		TWA	1.2143
		% variation (high:low)	29
3.8	0	2.3	
	7	2.3	
	13	2.6	
	21	2.4	
		TWA	2.4190
		% variation (high:low)	12
7.5	0	2.9	
	7	3.7	
	14	5.2	
	21	4.7	
		TWA	4.2333
		% variation (high:low)	44
15	0	6.5	
	7	7.5	
	13	9.9	
	21	8.7	
		TWA	8.3619
		% variation (high:low)	34
30	0	18	
	7	17	
	13	16	
	21	20	47 40 40
		TWA	17.4048
		% variation (high:low)	20